

National Institute for Health and Care Excellence

PUBLIC HEALTH GUIDELINES – Excess winter deaths and illnesses - Consultation on the Draft Guideline from 13th June – 25th July 2014 Comments to be received no later than 5pm on 25th July 2014

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Stakeholder Comments

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Name:		William Baker
Organisation:		Citizens Advice
Section number Indicate section number or ' general ' if your comment relates to the whole document	Page Number	Comments Please insert each new comment in a new row.
Recommendation 1	4	<u>Require all H&WBs to make action on affordable warmth a priority</u> Citizens Advice is concerned that some H&WBs may not choose affordable warmth as a local priority, particularly given the lack of priority many public health directors place on poor housing as a determinant of ill health. Yet every area in the country has poor, cold and damp housing and thus in every area there will be households suffering ill-health arising from cold homes. We therefore consider <u>all</u> H&WBs should be required to promote affordable warmth.

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Recommendation 1	4	<u>Minimum energy efficiency standards:</u> We welcome the proposal to set minimum energy efficiency standards for home improvements and consider this will make a major contribution to reducing cold home-related ill health. We note the Government's recent proposal to improve the homes of fuel poor households to a minimum standard of EPC C by 2030. We consider the guidance should propose that H&WBs adopt a similar standard for all <u>low income</u> (not just 'fuel poor') households. The guidance should also set a specific date – we advocate 2025. We also propose that the homes of all households vulnerable to cold home related ill-health should be improved to the minimum standard we advocate.

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Recommendation 1	4	<u>Monitoring and evaluation:</u> We would like the guidance to highlight the importance of monitoring and evaluating affordable warmth strategies. This is important to make sure interventions are assessed and improved upon.
Recommendation 1	4	<u>Income maximisation:</u> Citizens Advice considers advice on income maximisation, such as claiming benefits and tax credits and debt counselling can also make an important contribution to people's ability to afford energy (in addition to energy efficiency improvements). We suggest the guidance should refer to this.

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Recommendation 2	5	<u>Stimulating the market / existing provision of advice services</u> The guidance assumes that there is an existing market in place which will provide the support services outlined. The current funding environment across public and voluntary sector is tough, which will continue. The guidance needs to take account of the role of H&WBs in stimulating and continued support for the market of providers. Funding arrangements to voluntary sector organisations from local authorities often comes from different departments. A co-ordinated approach to funding arrangements is required to ensure that support services continue to be funded to deliver their core service, such as CAB.

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Recommendation 2	5	<u>Face to face advice</u> There are additional and unavoidable costs of delivering face to face services. Whilst voluntary sector providers remain flexible and adaptable in a challenging funding landscape, costs of delivering enhanced face to face services can not necessarily be absorbed by existing funding streams. Face to face service remains the most effective channel to resolve complex problems or support more vulnerable clients. We'd ask that NICE carefully consider how funding can be provided by H&WBs to support service providers, like CAB, to ensure needs are met appropriately.
Recommendation 2	5	<u>Provision of 'non-advice' services</u> The guidance should specify the services that should be available (described in Recommendation 3) and the role of H&WBs in making sure those services are made available. This may require H&WBs to commission services, where local provision does not already exist.

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Recommendation 2	5	<u>Mandated health referrals</u> We note that the government is proposing to develop a system of 'mandated health referrals' from GPs, nurses and other frontline health workers to energy efficiency support for those at risk of ill-health due to cold homes (DECC, 2014, <i>Cutting the cost of keeping warm</i>). We strongly support this proposal and consider H&WBs could play a key role in facilitating this process and for making sure local support is available.
Recommendation 2	5	<u>Free phone number</u> It is important that calls to the referral service are free from both landline and mobile phones to ensure all consumers, particularly those on low incomes, can access the service.

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Recommendation 2	5	<u>Identifying information advice needs as part of the Care Pathway</u> The guidance should make explicit recommendations that the information and advice needs of the client are recorded as part of their care plan (on the proviso that client consent is given). We believe that understanding and solving the social and economic determinants of a client's health are integral to achieving better wellbeing.

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Recommendation 3	6	<u>Setting up a new referral and co-ordination service</u> We have concerns about setting up a new referral and co-ordination service that does not take account of the existing mechanisms for identifying, assessing and signposting client needs at point of access. For example, Citizens Advice Bureau has a national triage needs assessment process called "gateway". Clients accessing CAB services at the first point of access, whether online, face to face or via telephone are gateway assessed to understand and triage their needs affectively. Clients are signposted to the appropriate information, services and face to face appointments are booked as required.

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Recommendation 3	6	<u>Local coordination of advice services</u> A key feature of the government Advice Services Transition Fund (ASTF), which ends in March 2015, is its bringing together of key advice partners locally. Building effectively partnerships, referral mechanisms and crucially, triage assessments (with gateway at the heart of the design) has been a key feature of ASTF. Whilst we welcome this guidance, we'd recommend that H&WBs are required to review existing triage and referral mechanisms, and where possible, take existing local mechanisms into account, to ensure a lack of duplication in organising and delivering this new service.

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Recommendation 4	7	<u>Use of existing data</u> There are currently large variations in the availability and strategic use of local data. The guidance should encourage H&WBs to work together in developing best practice on data use. There should also be national guidelines to H&WBs on the sharing and use of datasets and national free provision of key datasets, such as local Energy Performance Certificate data (local authorities currently have to buy this at considerable expense).
Recommendation 5	7	<u>Provide guidance on visual clues</u> Professionals that carry out assessments in the home should receive training/guidance on visual clues that prompts them to identify and refer households at risk.

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Recommendation 5	7	<u>'Vulnerable' people</u> The guidance should make clear that health and social care professionals should also identify people who are <u>potentially</u> vulnerable to cold-related ill health and take preventative action wherever possible. It is also important that professionals should recognise that vulnerability is a fluid condition – people move into and out of vulnerability.
Recommendation 5	7	<u>Emergency help</u> Some people may need emergency support and help, for example when boilers have broken down or when they have no money to keep prepayment meters in credit. The guidance should highlight the importance of making sure there is emergency and contingency provision.

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Recommendation 5	7	<u>Case studies</u> We suggest the guidance includes case studies of poor housing conditions, their impact on occupants' health and how affordable warmth interventions have helped people with specific medical conditions. Examples of CAB advice initiatives are given below:

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Recommendation 5	7	<u>Tendring Citizens Advice Bureau "ReachOut"</u> Tendring ReachOut project helps people receive advice and assistance in deprived areas. ReachOut provides advice and support by knocking on doors, meeting people in the street and at local community venues. It offers support on a range of issues, such as finance, employment, housing, training opportunities and accessing services. The project seeks to address the wider determinants of health, such as low income, poor housing, low education, training or employment opportunities. ReachOut is a partnership with the local Citizens Advice Bureau, North East Essex NHS, Essex County Council, and the Inbiuteration Partnership. <u>Tendring Citizens Advice Bureau "Winter Warmers" Pop Up Shop</u> The bureau has also worked in partnership with the local authority to host a seasonal "pop-up" shop which enables the community to donate clothes, blankets and other goods which are distributed to residents vulnerable to the cold weather.

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		Walsall CAB – supporting older people service Walsall CAB provides a holistic generalist information and advice services to vulnerable clients over the age of 50 and their family and carers. This includes advice on welfare benefits and tax credits, debt, housing and employment, help with form filling, negotiation with third parties and assistance with reviews and appeals. Clients identified by social care, health and VCS professionals are invited to participate in a telephone appointment with the CAB. An initial gateway assessment of the client's needs is carried out to understand the client's background and personal circumstances (including income). Following this assessment, the bureau will action the client's case, for example; ordering correct forms to their home, making referrals to partner organising or requesting further information ahead of an appointment to support a benefit application or preparing to accompany the client to a tribunal or court hearing. The bureau also provides an appointment based home-visiting service.

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Recommendation 7	9	<u>Preventing self-disconnection by prepayment meter consumers</u> Citizens Advice is about to publish new research on self-disconnection from prepayment meters, with recommendations for improving policy. The guidance should make sure H&WBs, health and social care workers and other relevant local service providers are aware of a range of potential options to maintain fuel supply and improve services to prepayment meter consumers. New services are available that can help prevent self-disconnection from prepayment meters caused in error. These include: <ul style="list-style-type: none">• Friendly credit for gas and electricity to minimise inconvenience, e.g. a non-disconnect period for outside standard shop opening hours so, even if all the energy credit is used, the supply will continue until the start of normal working hours on the next day• Free low credit alerts e.g. texts to mobile phones, or an alarm on the smart energy display to warn the customer when they are low on credit

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Name:		William Baker
Organisation:		Citizens Advice
Section number Indicate section number or ' general ' if your comment relates to the whole document	Page Number	Comments Please insert each new comment in a new row.
Recommendation 7	9	<u>Free access to real-time data for prepayment meter consumers</u> <ul style="list-style-type: none">• Suppliers should provide free access to near real-time (for electricity) and historic information on their energy use to help them budget and become more energy efficient.• Real-time data should give consumers up to date account information in pounds and pence on their energy use, information on any standing charges and debt repayments. This includes consumers with disabilities and vulnerabilities.
		<u>Using new technology to help those most in need</u> <ul style="list-style-type: none">• Suppliers should innovate to help those most in need e.g. introducing a lifeline of energy supply as an alternative to self-disconnection and/or provision of tailored energy efficiency advice.• Suppliers should use new technology to better identify and offer support to vulnerable customers and those that are regularly self-disconnecting because they cannot afford their bills.

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Section number Indicate section number or ' general ' if your comment relates to the whole document	Page Number	Comments Please insert each new comment in a new row.
Recommendation 7	9	<u>Smart meter roll-out</u> The roll out of smart meters provides new opportunities to reduce the risk of ill-health from cold homes. It is important H&WBs, health and social care workers and other relevant local service providers are aware of these opportunities. Citizens Advice wants to see a range of protections put in place for consumers in vulnerable positions. <u>Extra help scheme</u> Suppliers should deliver extra help alongside the installation of smart meters to ensure people have the means to take control of their heating, in response to the information provided by the smart meter. Citizens Advice is proposing a range of pilots to test how this help could be delivered, including proposals to install and/or set basic heating controls.

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Recommendation 7	9	<u>Use of smart meter data</u> Data from smart meters may help relatives and carers monitor the activities of people in poor health, allowing people to remain in their own home and maintain their independence longer than previously possible. However, this level of monitoring is invasive. Such monitoring should only be undertaken with the residents' direct consent, interventions should follow an agreed process, the use of the data must be specified, and should not be stored for longer than necessary to assist the monitoring process, i.e. to enable comparison and patterns of behaviour.
Recommendation 7	9	<u>Heating controls</u> 70 per cent of households do not have a full set of heating controls, and many that do may not know how to use them effectively to maintain comfortable and healthy temperatures at an affordable price. Citizens Advice wants advice provided alongside the Green Deal and ECO, and the smart meter rollout, to help consumers take control of their heating to the benefit of their health and finances.

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Recommendation 8	9	<u>Speedy processing of grants</u> It is important work to improve homes is carried out as quickly as possible to avoid delays in discharge. There may be potential to extend social housing providers 'emergency provisions' to private households in vulnerable circumstances. The government proposal to develop a system of 'mandated health referrals' from GPs, nurses and other frontline health workers to energy efficiency support for those at risk of ill-health due to cold homes could play an important role in this respect (DECC, 2014, <i>Cutting the cost of keeping warm</i>).
Recommendation 9 & 10	10	<u>Affordable warmth training</u> This training should form a core part of all relevant professionals' training. It should also cover basic awareness of evidence indicating cold homes such as mould growth and inadequate heating systems, heating controls, insulation and ventilation.

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Recommendation 10	10	<u>Training support for CABx and smaller charities</u> Training support should be put in place for smaller charities, such as local CABx, since many will not have the resources to pay for and attend regular training.
Recommendation 12	11/12	<u>Set a benchmark for advice provision</u> The guidance makes reference to the need for national advice to take into account local and regional variations in the kind of support offered. To support the aspiration that broadly the same level of support is offered across England the guidance should develop a benchmark or standard for what type of advice should be freely available to all, or to at least recommend that such a standard is developed.

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